

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 1:21-CR-40

Plaintiff,

v.

CHRISTOPHER ALLAN BODEN,
a/k/a "CAPTAIN,"
LEESA BETH VOGT,
a/k/a "LIS BOKT," a/k/a "MOOSE," AND
DANIEL REYNOLD DEJAGER,
a/k/a "DANIEL REYNOLD," a/k/a "DANIEL
MIESTER," a/k/a "DANICHI",

Hon. ROBERT J. JONKER
U.S. District Judge

Defendants.

MOTION FOR FINAL ORDER OF FORFEITURE

Plaintiff United States of America, by its undersigned counsel, respectfully submits its Motion for a Final Order of Forfeiture for the reasons set forth below. A proposed order is submitted with this motion.

1. In the Forfeiture Allegation of the Indictment in this case, the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), 28 U.S.C. § 2461(c), and 31 U.S.C. § 5317, sought forfeiture of certain property described as: all virtual currency accessible from wallets associated with two Trezor devices seized from the Geek Group on December 21, 2018, comprising at least 0.365 BTC (hereinafter the "Subject Property").

2. Defendant Christopher Allen Boden entered a plea agreement with the

United States and consented to the forfeiture of his interest in the Subject Property to the United States. Defendant pleaded guilty to Counts 2, 16, and 21 of the Indictment on October 18, 2021.

3. Defendant Leesa Beth Vogt entered a plea agreement with the United States and consented to the forfeiture of her interest in the Subject Property to the United States. Defendant pleaded guilty to Count 19 of the Indictment on October 6, 2021.

4. Defendant Daniel Reynold Dejager entered a plea agreement with the United States and consented to the forfeiture of his interest in the Subject Property to the United States. Defendant pleaded guilty to Counts 1 and 4 of the Indictment on October 7, 2021.

5. By virtue of their plea agreements and the Defendants' guilty pleas, this Court found that the United States established the requisite nexus between the Defendants' criminal activity and the Subject Property, and accordingly, entered a Preliminary Order of Forfeiture regarding the Subject Property on February 23, 2022. (R.100, PageID.968-970.)

6. In accordance with 21 U.S.C. § 853(n)(1), the United States published a notice of forfeiture online for thirty days at www.forfeiture.gov beginning February 25, 2022 (*See* Exhibit 1.)

7. Pursuant to 21 U.S.C. § 853(n), any person asserting a legal interest in the Subject Property may petition the Court for a hearing to adjudicate the validity

of his/her alleged interest. All petitions regarding the Subject Property were due on or before April 26, 2022. 21 U.S.C. § 853(n)(2).

8. No petitions were filed in this case. Therefore, any third-party interests are barred by failure of those parties to file a timely petition. 21 U.S.C. § 853(n)(7).

Accordingly, the United States respectfully requests that this Court enter a final order of forfeiture as proposed in the attached order.

Respectfully submitted,

MARK A. TOTTEN
United States Attorney

Dated: January 13, 2023

/s/ Daniel T. McGraw
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